

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND )  
COMPOUNDING PHARMACY, INC. ) MDL No. 2419  
PRODUCTS LIABILITY LITIGATION ) Dkt. No. 1:13-md-2419-RWZ  
\_\_\_\_\_ )

This Document Relates to Suits Naming: )

Saint Thomas Outpatient Neurosurgical )  
Center, LLC )  
\_\_\_\_\_ )

**NOTICE OF FILING**

Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN, CNOR; and Vaughan Allen, MD; (frequently referred to as the “Tennessee Clinic Defendants” and herein referred to as the “STOPNC Defendants”) give notice to the Court and to all parties of the filing of the following:

1. Affidavit of John W. Culclasure, MD (with exhibits)
2. Affidavit of Scott Butler (with exhibits)
3. PSC’s Responses to Requests for Admissions 1 and 2
4. PSC’s Supplemental Responses to Interrogatory 1
5. Excerpt from deposition transcript of Cindy Williams.<sup>1</sup>

<sup>1</sup> The transcript has been designated confidential by the Saint Thomas Entities. Rather than requiring the STOPNC Defendants to file the entire transcript under seal, the Saint Thomas Entities have agreed to the filing of this excerpt from the transcript.

Respectfully submitted,

**GIDEON, COOPER & ESSARY, PLC**

/s/ Chris J. Tardio

**C.J. Gideon, Jr.\***

**Chris J. Tardio\***

**Alan S. Bean\*\***

**Matthew H. Cline\***

315 Deaderick Street, Suite

Nashville, TN 37238

Ph: (615) 254-0400

Fax: (615) 254-0459

[chris@gideoncooper.com](mailto:chris@gideoncooper.com)

***Attorneys for the Tennessee Clinic  
Defendants***

\* Admitted pursuant to MDL Order No. 1.

\*\* Admitted *pro hac vice*.

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 3rd day of December, 2015.

/s/ Chris J. Tardio

**Chris. J. Tardio**